



## SNP Administrative Review Findings

## Queen of Peace School (K378)

### Program Year 2024

#### Queen of Peace School (K378)

4508 Vistula Road  
Mishawaka, IN 46544-4054

#### Food Service Contact

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Director of Food Services  
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#### Executive Contact

Mrs. Kathy Barouska  
Administrator for Parish and School  
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No. of Sites / Reviewed: 1 / 1  
Month of Review: March 2024

### Certification and Benefit Issuance - Queen of Peace School (K378)

#### 133. Direct Certifications were correctly certified

##### **Finding 9024: Direct Certifications were not correctly certified**

Direct certification documentation for selected students was reviewed for completeness and accuracy. Some students were certified for free meals incorrectly. One household with 3 students were directly certified for reduced price meals without a current year DC match on file. One household with 2 students were directly certified for free meals without a current year DC match on file. The benefit certification errors will contribute toward fiscal action calculations.

##### **Corrective Action:**

The direct certification errors were reviewed with the Director of Food Services while onsite. She corrected the affected students' meal statuses on 4/22/24 and sent the required 10-day adverse action notification letter with an effective date of 5/1/24. **No further corrective action is needed.**

### Verification - Queen of Peace School (K378)

#### 206. On-site observations validate Off-Site Assessment Tool responses to Verification questions and responses demonstrate compliance with FNS requirements? Does the Verification Summary Report accurately reflect the SFA's enrollment?

##### **Finding 9006: Validation of Off-Site Assessment Tool**

On-site observations do not validate Off-Site Assessment Tool responses to Verification questions and/or responses do not demonstrate compliance with FNS requirements.

1. Confirmation review not documented. The Verifying Official & Confirming Official are listed as the same person (Principal), which is acceptable if this person did not originally approve any meal applications.
2. The number of students as of Oct 1 versus the number of applications on file as of Oct 31 are the same on the Verification Summary Report (VSR). The field specialist counted 18 applications on file as of Oct 1, but the SFA reported 27 on the VSR. Only one application was needed to meet the verification sample size, which the SFA correctly pulled & verified.
3. The VSR indicated one application was Verified for Cause, but this could not be validated; no documentation was available to support that information or the use of Direct Verification (DV).
4. The Verification process timeline could not be validated as there was no Verification notification documentation available for review.
5. The VSR was submitted in April, well after the due date of January 15.

##### **Corrective Action:**

The Director of Food Services, Parish Administrator, Principal, and Pastor were provided technical assistance regarding the proper Verification process. A Verifying Official should be identified to complete all Verification activities. The process should begin on October 1 and be completed by November 15 each year. Once the Verifying Official has selected the correct sample size, the selected applications should be reviewed by the Confirming Official to ensure the initial approval of meals benefits is



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correct. After the confirmation review, Direct Verification should be attempted. Direct Verification (DV) is different from Direct Certification. If the application can be directly verified for the benefit approved on the application, the printout should be saved and retained with the verification documents. The DV process eliminates the need to contact the household for additional

information. If no applications can be directly verified, the Verification process should continue by sending out notification letters to the selected households with complete instructions on what documentation needs to be submitted back to the school. Once a household has responded and the SFA has reviewed the documentation, an additional notification letter of the results must be sent to the household. All Verification documentation must be maintained as proof that the process was completed accurately and in the required timeframe. Though the Verification process must be completed by November 15, the SFA has until January 15 each year to submit the Verification Summary Report (VSR).

**As corrective action, please identify the individuals who will serve as the Verifying Official and the Confirming Official each year. In addition, please have those identified complete the "Verification" training course on the IDOE Moodle training website. Submit the certificates of completion as proof of training.**

**Moodle Website:** <https://moodle.doe.in.gov/>

**Moodle Instructions:** <https://docs.google.com/document/d/1FHEZKGaccC9nosDj7pU63PMVUtbZeYwkkqW-Gkn8Q4/edit>

**Technical Assistance:**

The Office of School & Community Nutrition offers multiple Verification webinars each year prior to October 1. Though the Verification Moodle course is required as corrective action, those involved in the Verification process should plan to attend the Verification webinars as a refresher when the time comes. The additional Verification resources below can be printed off and used as reference guides.

**Verification How-To:** [https://docs.google.com/document/d/1k2SleVd6qN9NNMT-hBbRQtLiED2TkirtEN5nvrF\\_bOM/edit](https://docs.google.com/document/d/1k2SleVd6qN9NNMT-hBbRQtLiED2TkirtEN5nvrF_bOM/edit)

**Verification Process Quick Guide:**

<https://docs.google.com/presentation/d/1drW0hi1KwCrJSD3xDLJMLX8hYdNIZRjaptlqdwAVIaM/edit#slide=id.p1>

**Direct Verification Fact Sheet:**

<https://docs.google.com/document/d/1wwB7sk01zzpk1xCbmxnzaBWZUSNFyELibunUdZJA-zg/edit#heading=h.gjdgxs>

**Verification for Cause Fact Sheet:**

[https://docs.google.com/document/d/1FAEMUdFj\\_Z1YCsDEMjHTNrL4sqXxsYRcsuDIFS0kikk/edit](https://docs.google.com/document/d/1FAEMUdFj_Z1YCsDEMjHTNrL4sqXxsYRcsuDIFS0kikk/edit)

211. SFA's verification notification letter included all required information

**Finding 9044: Verification notification letter does not contain all required information.**

The SFA selected one application for Verification, however, a verification notification letter was not provided for review. The SFA must notify the household selected for verification with a notification letter that includes all the required information, as follows: a statement that the household application for Free and Reduced Price Meals has been selected for verification; a telephone number for assistance; the type of information or documents the school accepts; a statement that the household is required to submit the requested information to verify eligibility for free or reduced-price meals by the date determined by the local educational agency; a statement that the household may, instead, submit proof that the children receive SNAP, FDPIR, or TANF assistance; or a statement that the household may, instead, request that the local educational agency contact the appropriate officials to confirm that their children are foster, homeless, migrant, or runaway. All communication with the household concerning verification must be in an understandable and uniform format and, to the maximum extent practicable, in a language that parents and guardians can understand.

**Corrective Action:**

**See Finding 9006 for corrective action.**



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#### Technical Assistance:

Verification information, including notification letter templates, are updated annually, and can be found on the Verification website: <https://www.in.gov/doi/nutrition/free-and-reduced-information/verification-and-direct-verification/>.

### Meal Counting & Claiming - Queen of Peace School (K378)

313. On-site observations validate Off-Site Assessment Tool responses to Meal Counting & Claiming questions and responses demonstrate compliance with FNS requirements

#### Finding 10153: Edit Checks

Edit checks were not conducted and/or documented.

#### Corrective Action:

Technical assistance was provided to the Director of Food Services regarding the need for monthly edit checks. The IDOE's edit check template & instructions were provided and reviewed onsite. See edit check template in TA section below for reference. The Director of Food Services completed the breakfast & lunch edit checks for March while the field specialist was onsite. She demonstrated a clear understanding of the edit check process and verbally acknowledged that she will complete a monthly edit check prior to submitting the monthly claim for reimbursement moving forward. **If implemented as agreed upon, no further corrective action is needed.**

#### Technical Assistance:

Edit Check & Instructions: <https://www.in.gov/doi/files/Edit-Check-Daily-Meal-Counts.pdf>

### General Program Compliance - Queen of Peace School (K378)

808. On-site observations validate Off-Site Assessment Tool responses to Civil Rights questions and responses demonstrate compliance with FNS requirements

#### Technical Assistance: Civil Rights Training Documentation

The Director of Food Services completed civil rights training for food service & teaching staff, however, the documentation did not include a detailed agenda. The Director was provided technical assistance regarding the IDOE's civil rights training agenda template below that can be used in the future & will capture all the required training topics.

<https://docs.google.com/document/d/1sDPkPrBkuNOrC6hd8zBBJ1reciB-s3mZNmGd0feBRik/edit>

810. The USDA non-discrimination statement is on appropriate Program materials

#### Finding 10125: Non-compliance with the USDA non-discrimination statement

The full USDA non-discrimination statement was not displayed on the "Lunch Program" webpage.

#### Corrective Action:

Please use the full nondiscrimination statement linked below to update the "Lunch Program" webpage. **As corrective action, please provide a screen shot of the webpage or a direct link to the webpage as proof that the statement has been updated.**

#### Technical Assistance:

USDA Full Nondiscrimination Statement:

<https://www.fns.usda.gov/civil-rights/usda-nondiscrimination-statement-other-fns-programs>



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1007. On-site observations validate Off-Site Assessment Tool responses to Local School Wellness Policy questions and responses demonstrate compliance with FNS requirements

#### Technical Assistance: Wellness Policy Requirements

The Director of Food Services, Parish Administrator, Principal, and Pastor were provided technical assistance regarding stakeholder participation, minimum policy requirements, and the need to complete the triennial assessment. They were further reminded to update the current links to the policy on the school's website and post the results of the assessment once it has been completed.

**Minimum Requirements:** <https://www.in.gov/doi/files/minimum-requirements.pdf>

**Triennial Assessment Template:** <https://www.in.gov/doi/files/triennial-assessment-template.pdf>

1219. Employees outside of the School Nutrition Programs with School Nutrition Program duties received appropriate training

#### Technical Assistance: Training for Non-Food Service Staff with School Nutrition Program Duties

In the offsite questions, the SFA indicated they had no non-food service staff conducting food service related duties, but on the day of the onsite review, a non-food service staff member was responsible for meal counting at breakfast in the cafeteria, and the Pre-K teachers were responsible for marking meal count rosters for breakfast in the classroom.

The Director of Food Service was reminded that any non-food service staff members with duties related to the School Nutrition Programs must receive annual training related to their responsibilities, including Meal Counting and Offer vs. Serve. The Director should maintain documentation of this training. This requirement was also discussed with the Parish Administrator, Principal, and Pastor during the exit meeting. These individuals should be included in the Offer vs. Serve training for all staff before PY2025 operations begin. The training agenda template below can be used to document all staff training.

<https://acrobat.adobe.com/link/review?uri=urn:aaid:scds:US:388c5cd8-5ecf-347a-8b54-a75f97924e16>

1500. Reports are submitted to the Indiana Department of Education as required

#### Finding 9151: SFA does not meet reporting deadlines to the State agency as required.

The Verification Summary Report (VSR) was not submitted to IDOE on time.

#### Corrective Action:

See Finding 9006 for corrective action.

#### Technical Assistance:

#### School Nutrition Programs Calendar of Due Dates:

<https://docs.google.com/document/d/1y9oJ3Of6GCteK2M6IDPen8cf35SoO8BsRV8dqoalLw/edit?usp=sharing>



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**SNP Administrative Review Findings**

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*1501. Records are retained for 3 years*

**Finding 9152: SFA not retaining Program records for a minimum of 3 years.**

The SFA is not retaining the appropriate records regarding program management for 3 years after the final Claim for Reimbursement for the fiscal year or until resolution of any audits. As noted in Finding 9006, Verification notification documentation was not available for review.

**Corrective Action:**

**See Finding 9006 for corrective action.**

**Technical Assistance:**

**Record Retention Guidelines:**

[https://docs.google.com/document/d/1pv9\\_WHvEMp9GbR3723kwdKVUMMKo5Zq1PjXZ7O3Zw2Q/edit?usp=sharing](https://docs.google.com/document/d/1pv9_WHvEMp9GbR3723kwdKVUMMKo5Zq1PjXZ7O3Zw2Q/edit?usp=sharing)



**SNP Administrative Review Findings**  
*Program Year 2024*

**Queen of Peace School (K378)**

**Queen of Peace School (D198)**  
4508 Vistula Road  
Mishawaka, IN 46544-4054

**Food Service Contact**  
Mrs. Jennifer Eagers  
Director of Food Services  
(574) 255-9674

Month of Review: March 2024  
Date of Onsite Review: April 18, 2024

**Pre-K Meals - Queen of Peace School (D198)**

*1. Pre-k meal pattern.*

**Technical Assistance: Pre-K Meal Pattern & Grain-Based Desserts**

Technical assistance was provided to the Director of Food Services regarding the Preschool meal pattern and expectations for following it for breakfast in the classroom.

**Preschool Meal Pattern:** <https://drive.google.com/file/d/1-L2ac281PTOK4-Sui5JCWzwCYqjbt6lz/view>

**Grain-Based Desserts:** <https://drive.google.com/file/d/1BJVaqFJJbkoQwbsZX3Cpy-L4clJSg3Sr/view>

When Pre-K students are comingled with the older grade levels for breakfast or lunch in the cafeteria, the K-5 meal pattern can be followed.

**Meal Counting & Claiming - Queen of Peace School (D198)**

*325. Review Period- meal counts by category were correctly used in the claim for reimbursement*

**Finding 9074: School's meal counts by category not used correctly in the SFA's claim for reimbursement.**

The SFA's claim for the school for the Review Period did not match the State agency's validated meal counts by category for the school for the Review Period. The SFA had underclaimed both breakfast and lunch but was provided the opportunity to correct the claim while the field specialist was onsite. The problem is considered systemic because the contributing factors are built into the process and would likely recur if the process is not changed.

**Corrective Action:**

Technical assistance was provided to the Director of Food Services regarding the underclaim and need for a second individual to double check the claim numbers for accuracy prior to submitting the claim for reimbursement. It was agreed that the school's Office Manager would review the claim and sign off on it before the Director submits it within CNPweb monthly. **Implemented as agreed upon, no further corrective action is needed.**

**Meal Components & Quantities - Queen of Peace School (D198)**

*404. Day of Review- signage explaining the reimbursable meal was posted near/at the beginning of the service line and did not promote water or any other beverage as an alternative to milk*

**Finding 9055: No signage explaining what constitutes a reimbursable meal at beginning of service line.**

As observed on the Day of Review, signage explaining what constitutes a reimbursable breakfast was not posted.

**Corrective Action:**

The Director of Food Services was provided technical assistance during the onsite visit and provided breakfast component signage options to post immediately to correct the issue. **No further corrective action is needed.**



409. *Review Period- all required meal components per weekly meal pattern requirements were offered and served to students*

**Technical Assistance: Offering Two Types of Milk at Breakfast**

At breakfast, two types of milk were not served during the review period. The production records did not note why only one type of milk was served. However, in discussing the issue with the Food Service Director, she noted that the school prefers to offer only 1% white & fat-free white milk for breakfast. Fat-free white milk was not available from the vendor, so they were only serving 1% white milk. Technical assistance was provided to the Food Service Director regarding options available to help meet the two types of milk requirement in this situation. The school may serve low-fat or fat-free lactose-free white milk or offer fat-free flavored milk for the time being until fat-free white milk is available again.

500. *Day of Review- Offer vs. Serve was properly implemented*

**Technical Assistance: Implementation of Offer vs. Serve**

CNPweb indicated that the SFA was implementing Offer vs. Serve (OVS) at both breakfast & lunch, but that was not observed while the field specialist was onsite. While the SFA offered multiple choices within the entree, fruit, vegetable, & milk components, all students were still required to select a choice from each component at breakfast & lunch. During the onsite meal observations, all breakfast & lunch meals that were rang up at the point-of-service were reimbursable without using OVS.

The Director of Food Services, Parish Administrator, Principal, and Pastor were provided technical assistance regarding the proper implementation of Offer vs. Serve. At this point in the school year, the SFA will continue to not implement OVS & will plan for OVS next school year. This will allow time for food service & teaching staff to be properly trained before PY2025 operations begin. Students will also be educated on OVS at breakfast & lunch at the beginning of the school year to ensure they understand the process and know how to select the correct components to make a reimbursable meal.

501. *Cafeteria staff have been trained on OVS*

**Technical Assistance: Offer vs. Serve Training**

As previously noted, Offer vs. Serve was not being implemented by the SFA. However, technical assistance was provided regarding the need for OVS training before PY2025 operations begin. The Director of Food Services was reminded that all staff training needs to be documented with a detailed, dated agenda, complete with staff signatures. The training agenda template below can be used to capture the required information.

<https://acrobat.adobe.com/link/review?uri=urn:aaid:scds:US:388c5cd8-5ecf-347a-8b54-a75f97924e1>